

SANDLER REIFF

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November 24, 2014

Via E-Mail and First Class Mail

Jeff S. Jordan, Esq.
Supervisory Attorney
Federal Election Commission
999 E Street, N.W.
Washington D.C. 20463

Re: MUR 6900

Dear Mr. Jordan:

I serve as counsel to the Kansas Democratic Party, and Mathew Wattkins, in his official capacity as Treasurer ("Respondents")(a designation of counsel is attached to this response) and I am writing in response to the Commission's letter dated November 7, 2014 regarding the above referenced matter and enclosing a complaint from Clay Barker, Executive Director of the Republican Party of Kansas.

In his complaint, Mr. Barker alleges that "various reports have indicated that the Kansas Democrats are supporting Greg Orman in numerous and unreported ways..." To this end, Mr. Barker alleges that it obtained a photograph taken of a "Kansas Democrats field office located at 102 S. Washington in Iola, Kansas" in which signs for Greg Orman can be seen inside an office. Mr. Orman was an independent candidate for United States Senate during the 2014 General Election.

Contrary to Mr. Barker's allegations, the office at 102 S. Washington in Iola Kansas was not a Kansas Democrats field office. Iola, Kansas is in Allen County, Kansas. During the 2014 general election, Respondents did not have any operational presence in Allen County. In addition, to the best of the knowledge of the Respondents, there are no organized Democratic Party committee organizations in Allen County. Respondents are not familiar with this office, nor do they know who may have leased any office space at that address for the 2014 election. However, to the best of the Respondents knowledge, any person or group who did rent that space was not an organized Democratic Party organization.

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Furthermore, Respondents categorically deny Mr. Barker's unsubstantiated allegation that the Democrats were "supporting Greg Orman in numerous and unreported ways." To the contrary, Respondents did not spend any funds on any campaign materials, mailings, phone calls or any other public political advertising that advocated the election of Mr. Orman. Attached is a declaration from Jason Perkey, Executive Director of the Kansas Democratic Party that asserts that Respondents did not spend any funds on field offices in Allen County or otherwise spend any funds advocating the election of Greg Orman.

For the reasons stated above, the Commission must find no reason to believe that Respondent has violated any provisions of the FECA and close the file in this matter.

Respectfully submitted,



Neil Reiff

Counsel for the Kansas Democratic Party
and Matthew Wattkins, in his official
capacity as Treasurer.

100444001090

**BEFORE THE
FEDERAL ELECTION COMMISSION**

IN RE

Kansas Democratic Party

MUR 6900

Declaration of Jason Perkey

1. My name is Jason Perkey. During the 2014 general election, I was the Executive Director of the Kansas Democratic Party ("KDP"). As the Executive Director, I was responsible for oversight of all aspects of the committee's operations during the 2014 general election.
2. As Executive Director, I had firsthand knowledge of all of the activities undertaken in connection with the KDP's 2014 general election activities. Therefore, I would have full knowledge of all expenditures for field offices, campaign materials and advertising that were funded by the KDP during the 2014 general election.
3. During the 2014 general election, the KDP did not spend any funds for a field office in Allen County, Kansas. To the best of my knowledge, no organized political party organization exists in Allen County, Kansas, and I do not believe that any offices were established in Allen County by any organized Democratic party organization. In addition, the KDP did not spend any funds on any campaign materials, mailings, phone calls or other advertising that advocated the election of Greg Orman.

I declare under penalties of perjury that the foregoing is true and correct to the best of my present knowledge, information and belief. Dated this 21 day of November, 2014.



Jason Perkey

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STATEMENT OF DESIGNATION OF COUNSEL

Provide one form for each Respondent/Witness

FAX 202-219-3923

MUR # 6900

Name of Counsel: Neil Reiff

Firm: Sandler, Reiff, Lamb, Rosenstein & Birkenstock, P.C.

Address: 1025 Vermont Ave. NW

Washington, DC 20005

Telephone: (202) 479-1111 Fax: (202) 479-1115

E-mail: neil@sandlerreiff.com

The above-named individual and/or firm is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

11/17/14 Matthew Watkins Treasurer
Date Signature (Respondent/Agent) Title

RESPONDENT: Kansas Democratic Party & Matthew Watkins in his official capacity as Treasurer
(Committee Name/ Company Name/Individual Named in Notification Letter)

Mailing Address: P.O. Box 1914
(Please Print)

Topeka, KS 66601

Telephone (H): _____ (W): (785) 234-0425

E-mail: _____

This form relates to a Federal Election Commission matter that is subject to the confidentiality provisions of 52 U.S.C. § 30109(a)(12)(A). This section prohibits making public any notification or investigation conducted by the Federal Election Commission without the express written consent of the person under investigation.



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11/17/14

Date

Matthew Watkins

Signature (Respondent/Agent)

Treasurer

Title

RESPONDENT: Kansas Democratic Party & Matthew Watkins in his official capacity as Treasurer
(Committee Name/ Company Name/Individual Named in Notification Letter)

Mailing Address: P.O. Box 1914
(Please Print)

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